

REMARKS/ARGUMENTS

By the present amendment, claims 14, 15, 19, 20 and 38 have been amended for purposes of clarity. In particular, claim 19 has been amended to overcome the objection that the Examiner has raised under 35 U.S.C. § 112, claims 14, 15 and 20 have been amended to correct clerical errors and claim 38 has been amended for purposes of clarity with respect to the operation of the hinge assembly. Support for the amendment to claim 38 is found in the Figs. 16, 17 and 27 as filed. No new matter has been added to the application.

Claim Rejections – 35 U.S.C. § 112

In the Office Action, the Examiner has rejected claim 15 under 35 U.S.C. § 112 as failing to comply with the enablement requirement. The Examiner believes that claim 15 contains subject matter which was not described in the specification in such a way as to enable one skilled in the art as it pertains or with which is most clearly connected, or to make and/or use the invention. In particular, the Examiner believes that the connection between the fastener and the walls as recited in claim 15 is not adequately disclosed in the application. Claim 15 has been amended to be consistent with the specification and is believed to overcome the Examiner's rejection under 35 U.S.C. § 112.

Claims 19 and 20 have been furthermore rejected under 35 U.S.C. § 112 as being indefinite for failing to particularly and distinctly claim the subject matter which Applicant regards as an invention. Claim 19 has been amended to correct a clerical error which gave rise into the Examiner's rejection. It is believed that all of the claims are now free from objections under 35 U.S.C. § 112.

Claim Rejections 35 U.S.C. § 102 (b)

Claims 2-4 and 38-43 have been rejected under 35 U.S.C. § 102 (b) as being clearly anticipated by the Styra U.S. Patent No. 6,098,696. This rejection is respectfully traversed.

The Styra '696 reference discloses a roll-up door construction that includes integral panels and a hinge assembly similar to that disclosed and claimed by Applicant. However, the Styra '696 reference hinge construction has an arcuate hook-shaped hinge member 60 on top of

one panel that rotates within a complementary arcuate channel 72 formed by an arcuate upper wall and an arcuate surface on a continuous integral pintle portion 74 on the bottom of an adjacent panel. The axis of rotation of the lower panel with respect to the upper panel is at a central axis of the pintle portion 74.

Applicant's claim 38 distinguishes over the Styra '696 reference in that it calls an elongated arcuate projection *including an elongated flange portion depending therefrom* and an elongated socket including an inner surface with a curvature complementary to the curvature of the arcuate projection and an elongated hook portion. Further, claim 38 calls for the elongated flange to rest on the elongated hook portion for relative rotation of the elongated panels with respect to each other. Whereas the Styra '696 assembly has an arcuate projection and an elongated arcuate channel, it does not have an elongated flange portion *depending from the arcuate projection*. Nor does it have an elongated hook portion that rotatably supports the elongated flange. To clarify this distinction, claim 38 has been amended to specify that a terminal end portion of the elongated flange portion rests on the elongated hook portion for relative rotation of the elongated panels with respect to each other about the terminal end portion. In distinction to the operation of Styra '696, the pivot axis of Applicant's hinge is at the terminal end of the elongated flange portion and not about a pintle. See Applicant's Figs. 16, 17 and 27, for example. No such structure is disclosed in Styra '696.

Claims 39-43 and 2-4 depend from claim 38 and define over Styra '696 in the same fashion as claim 38. In addition that, claim 39 calls for a hinge coupler that includes the elongated socket and has a connector with a snap fit fastener that is snap fit into an elongated groove and is retained therein by a retainer lip. In Styra '696, the elongated channel 72 is formed by an integral portion of the panels and is not formed by a hinge coupler as required by claim 39.

Claim 40 further defines over the Styra '696 reference in calling for the hinge coupler to include an axle mounting bracket. Although Styra '696 discloses an axle mounting socket, it is integrally formed with the panel and not as a part of a separate hinge coupler.

Claim 43 further defines over the Styra '696 reference in calling for an axle seat made from a wear resistant material. The Styra '696 panels are made from extruded lightweight metal, such as aluminum, or extruded plastic, and thus are not made of wear resistant materials.

Claim 43 further defines over the Styra '696 reference in calling for the hinge coupler with connectors which are releasably retained in one of the elongated grooves.

In view of the foregoing, it is submitted that claims 2-4 and 38-43 patently distinguish over the Styra '696 reference.

Final Claim Rejections - 35 U.S.C. § 103

Claims 9-13 and 17 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's preamble (presumably claim 9) in view of the Dielman U.S. Patent No. 3,799,593 and the Rohrer et al. U.S. Patent 5,927,368. This rejection is respectfully traversed.

The Dielman '593 patent relates to a door latch which is mounted in the lateral edge of a door panel, principally for restrooms.

The Rohrer et al. '368 reference discloses an overhead door for a loading dock mounted to a pair of rails through a releasable plunger that is released from the track when the doors are hit by a truck or another force that would otherwise break the doors. The plunger assemblies are mounted to the outside panel of the door with bolts that extend through the door.

The alleged combination of the preamble to claim 9 in view of the Dielman '593 reference and Rohrer et al. '368 reference is traversed. There is no basis for making the alleged combination.

The Examiner's assertion of obviousness is inappropriate since the Examiner has failed to satisfy the legal requirements for a *prima facie* case of obviousness under 35 U.S.C. § 103 (a). Moreover, the Examiner's asserted combination does not reach the claimed inventions described in any of the rejected claims.

A conclusion of obviousness must be based upon an Examiner's factual findings. "The factual predicates underlying an obviousness determination include the scope and content of the

prior art, the differences between the prior art and the claimed invention, and the level of ordinary skill in the art.” *In re Rouffet*, 149 F.3d 1350, 1355 (Fed. Cir. 1998).

To establish a *prima facie* case of obviousness, three basic criteria must be met:

1. There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings.
2. There must be a reasonable expectation of success.
3. The prior art reference must teach or suggest all the claimed limitations.

In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See also, MPEP 706.02(j) and 2143-2143.03.¹

In order to tenably combine references, there must be some suggestion in the references or generally available knowledge in order to make a tenable combination of disclosures. *In re Sang-Su Lee*, 277 F.3d 1338, 56 USPQ2d 1430 (Fed. Cir. 2000); *Ecolochem, Inc. v. Southern California Edison Company*, 277 F.3d. 1361, 56 USPQ2d 1065 (Fed. Cir. 2000). As aptly stated by Judge Newman in *Sang-Su Lee*;

...The patent examination process centers on prior art and the analysis thereof. When patentability turns on question of obviousness, the search for an analysis of the prior art includes evidence relevant to the finding of whether there is a teaching, motivation, or suggestion to select and combine the references relied on as evidence of obviousness. . . .

“The factual inquiry whether to combine references must be thorough and searching.” [Citation omitted] It must be based on objective evidence of record. This precedent has been reinforced in myriad decisions and cannot be dispensed with. ... *In re Dembiczak* 175 F.3d. 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999) (“Our case law makes clear that the best defense against subtle but powerful attraction of a hindsight based obviousness analysis is

¹ According to the MPEP, the Examiner should identify (A) the relevant teachings of the prior art relied upon, preferably with reference to the relevant column or page number(s) and line number(s) where appropriate, (B) the difference or differences in the claim over the applied reference(s), (C) the proposed modification of the applied reference(s) necessary to arrive at the claimed subject matter, and (D) an explanation why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification. *MPEP 706.02(j)*.

rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.”)

If any one of the obviousness criteria is not met, then a *prima facie* case of obviousness has not been made. In the present case, the rejection fails to meet several of the criteria, rendering the rejection unsustainable and the inventions of claims 9, 11, and 13-18 patentable. An analysis of the criteria supports this conclusion.

The Examiner has failed to demonstrate combinability of these references by objective evidence as required by *In re Sang-Su Lee, supra*. The Examiner has merely stated that it would have been obvious to modify the structure of Applicant's preamble whereby the latch is mounted in such recess so as to accurately position and maintain a latching position. This statement is conclusory and is not objective evidence of combinability. The Examiner has mistakenly assumed that he need not provide support for combining a secondary reference with a preamble which Applicant admits is old. For example, the Styra '696 reference discloses what is in the preamble. The Examiner is required by law to satisfy the requirements of 35 U.S.C. § 103 in the same manner regardless of whether the claim is in a Jepson form or whether it is not in Jepson form. The preamble in a Jepson form claim can be used by the Examiner in combination with another reference, but the Examiner still must satisfy the requirements of combinability of the preamble with the prior art. The Examiner has wholly failed to carry out this requirement in the rejection. There is nothing in either Applicant's claim 9 preamble or in the Dielman reference which will suggest that the Dielman latch could be combined with Applicant's claim 9 preamble to meet Applicant's claimed invention. The Dielman patent has no relationship to a roll-up door. Applicant is at a complete loss as to understand the relationship between a bathroom door latch and a roll-up door latch.

The Rohrer et al. '368 patent is likewise not combinable with either the claim 9 preamble or the Dielman '696 bathroom door latch. Rohrer et al.'368 discloses a spring biased plunger that fits within a groove in a door track to a door panel through a pair of bolts which extend through the panel. The bolts pass through sleeves which extend between the sides of the panel. There is nothing in any of these references which would suggest their combination. Applicant is at a complete loss as to understand how the mounting bracket disclosure of Rohrer et al. '368 could

be combined with the Dielman bathroom door latch. The Examiner's conclusory statement that "it is known to mount the door hardware to an overhead door in such a manner" [as disclosed by Rohrer et al. '368 reference] is without factual foundation. Dielman '696 does not relate to an overhead door latch and Rohrer et al.'368 does not disclose a latch mounted to an overhead door with through bolts. It is therefore apparent that the alleged combination of the preamble of claim 9 in view of Dielman '593 and Rohrer et al.' 368 reference does not meet the standard of 35 U.S.C. § 103 as required by *In re Sang-Su Lee, supra* or *In re Vaeck, supra*.

Applicants preamble of claim 9, the Dielman '593 reference and the Rohrer et al.' 368 reference all come from different fields of endeavor. There is virtually no relation to a roll-up door latch of Applicant's preamble, a bathroom door latch of Dielman '593 and the plunger in Rohrer et al.' 368. They are entirely different types of structures with the only similarity being the generic term "latch" in the Applicant's claim 9 preamble and the Dielman '593 reference. The Examiner has wholly failed to support the alleged combination of references with factual evidence. Conclusory statements are not evidence.

Still further, the Examiner stated that it would be obvious to modify the structure of Applicant's claim 9 preamble whereby the latches are mounted in a recess so as to accurately position and maintain the latching position is simply unsupported by any of the references. Roll-up door latches are fixed in position conventionally by bolts which extended through the door panels. There is no motivation shown in any of the references for the alleged combination.

However, even if the alleged combination of the Applicant's claim 9 preamble, Dielman '593 and Rohrer et al.' 368 could be made, however untenably, it still would not reach Applicants claimed invention. The alleged combination, at best, would mount the Dielman bathroom door latch within the side edge of the bottom panel of the roll-up door assembly and provide a knob to move the latch laterally into an opening in rails that mount the door panels. Further, the latch would be mounted within the door with through bolts which extend through both sides of the door. Sleeves would surround the bolts and provide support between the inner and outer walls of the door panel.

Applicant's claim 9 distinguishes over the alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368 in that it calls for a bottom panel which "further includes a latch recess in the exterior wall." This element is not disclosed in the Examiner's alleged combination of references.

Still further, claim 9 calls for the bottom panel to be extruded and to have multiple mounting supports disposed within the hollow interior and extending between the latch recess and the interior wall. This concept is not disclosed in the Examiner's alleged combination of references.

Still further, claim 9 calls for the latch assembly to be received in the latch recess (in the exterior wall of the panel). This feature is also not found in the Examiner's alleged combination of references.

In view the foregoing, it is submitted that claims 9-13 and 17 are patentable under 35 U.S.C. § 103 (a) over the Examiner's alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368.

Claims 13-17 depend from claim 9 and define over the Examiner's alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer '368 in the same manner as claim 9. In addition, claim 13 calls for the mounting supports to comprise extruded walls extending between the latch recess and the interior wall and arranged in spaced pairs and defining a channel therebetween in which a mechanical fastener is received. This element is not found in the Examiner's alleged combination of references.

Claim 16 further defines over the Examiner's alleged combination of references in calling for a backing plate recess on the interior wall of the bottom panel and at least part of the backing plate recess is opposite a portion of the latch recess. This feature is not disclosed in the Examiner's alleged combination of references.

In view of the foregoing, it is submitted that claims 9 and 13-17 patently define over any alleged combination of Applicant's preamble, Dielman '593 and Rohrer et al.' 368.

Claim 11 has been rejected under 35 U.S.C. § 103 over Applicant's claim 9 preamble in view of Dielman '593, Rohrer et al. '368 as applied against claim 9 and further in view of the Galbreath et al. U.S. Patent No. 3,802,726. This rejection is respectfully traversed.

The Galbreath '726 patent is cited to show an overhead door lock which is mounted on a mounting plate. Applicant admits that overhead door latches typically have mounting plates through which the latches are mounted to an overhead door. .

The alleged combination of Applicant's claim 9 preamble in view of the Dielman '593 and Rohrer et al.'368 and Galbreath et al. '726 is traversed. There is no basis for the alleged combination. The uncombinability of Applicant's preamble with Dielman '593 and Rohrer et al. '368 has been demonstrated above. Thus, the alleged combination of these references with Galbreath et al.' 726 must also fail. It is not altogether clear how the mounting plate would fit into the alleged combination of references in which the Dielman '593 latch is mounted into the side edge of the door panel.

Even if the alleged combination of Galbreath et al. '726 could in some way be combined with Applicant's claim 9 preamble, Dielman '593 and Rohrer et al.'368, it still would not reach Applicant's claimed invention. It is not clear where the Galbreath et al.' 726 mounting plate would be positioned in the structure alleged by the Examiner to result from Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368. In any case, the alleged combination of Galbreath et al.' 726 with the claim 9 preamble, Dielman '593 and Rohrer '368 would not meet the limitations of claim 9 as set forth above and therefore, would not meet the limitations of claim 11, which depends from claim 9. Further, the alleged combination of references would not include Galbreath et al.' 726 mounting plate within a latch recess in the exterior wall of the bottom panel. For these reasons, claim 11 patentably distinguishes over the Examiner's alleged combination of Applicant's claim 9 preamble, Dielman '593, Rohrer et al.'368 and Galbreath et al. '726.

Claim 12 has been rejected under 35 U.S.C. § 103 over the same alleged combination of references of claim 11 and further in view of the Bakalar U.S. Patent Publication Number US 2003/007036381. This rejection is respectfully traversed.

The Bakalar '363 reference relates to a selectively positionable window covering arrangement. Applicant is at loss to understand how the window covering arrangement of Bakalar '363 can possibly be related to a rollup door latch, a bathroom door latch, and an overhead door plunger. The Examiner has given no rational basis for the combination of the references applied against claim 11 and gives no rational basis for the combination of Bakalar '363 with this combination as well in his rejection of claim 12. In any case, the alleged combination of references does not meet the limitations of claim 9, as set forth above, from which claim 12 depends. It is thus submitted that claim 12 patently distinguishes over Applicant's claim 9 preamble, Dielman '593, Rohrer et al. '368 and Bakalar '363.

Claim 18 as been rejected under 35 U.S.C. § 103 over the Examiner's combination of references applied against claim 9 and further in view of the Martin et al. U.S. Patent No. Re. 31,461. This rejection is referred fully traversed.

The Martin '461 reference relates to an overhead door section system and method wherein each section is made from high tensile steel and secured to an end stile and a center stile. The end stile includes an angle support secured therein. The angle support clamps an end section facing against a front face of the end stile and is secured to the ribs in the section facing and to the side wall of the end stile. The Martin et al. '461 door section has indented grooves.

The alleged combination of Applicant's claim 9 preamble, Dielman '593, Rohrer et al. '368 and Martin et al. '461 is traversed. There is no basis for making the alleged combination. The alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368 have been discussed above and that discussion is believed equally applicable here. The Martin et al. '461 patent has no relationship to the roll-up door of Applicant's claims, nor does it have any relationship to the Examiner's alleged combination of Applicant's preamble, the Dielman '593 patent and the Rohrer et al. '368 and the Examiner has given no basis for making the alleged combination. Further, the Martin patent does not satisfy the deficiencies in the alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368 as discussed above with respect to claim 9. It is therefore evident that the alleged combination of Martin with Applicant's claim 9 preamble, the Dielman '593 and Rohrer et al. '368 does not meet Applicants

claim 9 from which claim 18 depends. Therefore, claim 18 is patentable over the Examiner's alleged combination of Applicant's claim 9 preamble, Dielman '593 and Rohrer et al. '368 and Martin et al. '461.

Claim 15 has been rejected under 35 U.S.C. § 103 at over Applicant's claim 9 preamble in view of Dielman '593 and Rohrer et al. as applied against claim 9 and further in view of the Jentoft et al. Re. 32,915 patent. This rejection is respectfully traversed.

The Jentoft et al. '915 patent relates to a skylight construction in which threaded fasteners are threaded into extruded channels. This reference is not relevant to Applicant's rollup door assembly. Nor does it bear any relationship to the alleged combination of Applicant's claim 9 preamble, the Dielman '593 bathroom door latch or Rohrer et al.'368 plunger assembly. There is no basis for the alleged combination of Jentoft et al. '915 with any these references and the Examiner has given none.

Claim 15 depends from claim 9 and distinguishes over the Examiner's alleged combination of references in the same fashion as claim 9. In addition, Applicant has amended claim 15 to specify that the spacing between the walls is greater than the outer diameter of the mechanical fasteners. It is thus believed that the rejection which is based in part on the Jentoft et al. '915 reference is moot.

Claim 19 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's claim 19 preamble in view of Martin et al. '461. This rejection is respectfully traversed.

The alleged combination of Applicant's claim 19 preamble and Martin '461 is traversed. There is no basis for making the alleged combination and the Examiner has given no basis. The Examiner has not met the standard of a *prima facie* case of unpatentability under 35 U.S.C. § 103(a) as required by *In re Vaeck, supra*, as discussed above. The examiner has given no factual basis for the alleged combination as required by *In re Sang-Su Lee, supra*. Thus, the Examiner has failed to satisfy the requirement of making a *prima facie* case of unpatentability under 35 U.S.C. § 103(a).

However, even if the alleged combination of Martin '461 with Applicant's claim 19 preamble were to be made, however untenably, it still would not meet Applicant's claimed invention. The alleged combination would simply provide the ridges of Martin and Applicant's bottom wall panels. The alleged combination would not have a reflector recess formed in an exterior wall, located near a bottom portion of the panel and of a size to receive therein a conspicuity reflector. Thus, it is submitted that claim 19 patentably defines over Applicant's claim 19 preamble in view of Martin et al. '461.

Claim 20 has been rejected under 35 U.S.C. § 103 (a) as being unpatentable over Applicant's preamble (presumably claim 19) in view of Martin et al.'461 as applied against claim 19 and further in view of the Galbreath et al. '726 reference. This rejection is respectfully traversed.

The alleged combination of Applicant's claim 19 preamble, Martin et al. '461 and Galbreath et al. '726 is traversed. There is no basis for making the alleged combination and the examiner has given no factual basis for the alleged combination of references.

However, even if the alleged combination of Applicant's claim 19 preamble, Martin et al. '461 and Galbreath '726, could be combined, however untenably, it still would not reach Applicant's claimed invention of claim 20. Claim 20 depends from claim 19 and defines over the Examiner's alleged combination of references in the same fashion as claim 19. In addition, claim 20 calls for a latch recess in the exterior wall of the bottom panel and a latch assembly mounted in the latch recess and further puts the reflector recess above the latch recess. The Examiner's alleged combination of references would not include a latch assembly mounted in a latch recess in an exterior wall of a bottom panel as required by claim 20 further would not include a reflector recess formed above the latch recess in a bottom panel. Thus, claim 20 is patentable under 35 U.S.C. § 103(a) over Applicant's preamble of claim 19 in view of Martin et al. '461 and Galbreath et al. '726.

Claims 21, 22, 24-28, 31-33 and 37 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the preamble of claim 21 in view of the Aquilino U.S. Patent No 6,363,993. This rejection is respectfully traversed.

The Aquilino '993 reference discloses a roll-up door construction having a bracket which forms a pivot mounting for segments of the roll-up door and further forms a socket for wheels that ride in rails for supporting the door for linear movement along the rails..

The alleged combination of Applicant's claim 21 preamble with Aquilino'993 is traversed. There is no basis in either Applicant's preamble or in Aquilino '993 for making the Examiner's alleged combination of references. The Examiner has not made *prima facie* showing of unpatentability because he has given no factual basis for combining Aquilino with Applicant's claim 21 preamble and further has not met all of the limitations of the alleged combination of references. The Examiner has given absolutely no factual reason why the Aquilino '993 reference can be tenably combined with Applicant's claim 21 preamble as required by *In re Vaeck, supra* and *In re Sang-Su Lee, supra*. Thus, the alleged combination must fail.

However, even if the alleged combination could be made, however untenably, it still would not reach Applicants claimed invention. The alleged combination of Applicant's claim 21 preamble with Aquilino '993 reference would simply provide the Aquilino '993 pivot bracket mounted to one of the panels and forming a circular projection that fits within an elongated socket in an adjacent panel for rotationally supporting the panels together. In addition, the alleged combination would mount a roller guide shaft within the socket of the bracket.

Applicants claim 21, and the claims dependent therefrom, distinguish over the alleged combination of references in calling for a mounting plate having a socket made of a wear resistant material attached to each of the lateral sides of the panels. The alleged combination of Applicant's claim 21 preamble with Aquilino '993 would not have a mounting plate with a socket made of a wear resistant material. The Aquilino '993 bracket is said to be made of a plastic material. See column 2, lines 60-63 of Aquilino '993. In addition, claim 21 distinguishes over the Examiner's alleged combination of Applicant's claim 21 preamble and Aquilino '993 in calling for mechanical fasteners that extend through interior and exterior walls of the panel. The Examiner's alleged combination would not include this feature. Thus, the Examiner has failed to make a *prima facie* case of unpatentability under 35 U.S.C. § 103(a).

Claims 22, 24-28, 31-33 and 37 all depend from claim 1 and define over the alleged combination of Applicant's claim 21 preamble in view of Aquilino '993 in the same manner as claim 21. In addition, claim 22 calls for the sockets to be made of a wear resistant metal. This limitation is not found in the Examiner's alleged combination of references.

Claims 29 and 34 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's preamble of claim 21 in view of Aquilino '993 is applied against claim 21 and further in view of Martin et al. '461. This rejection is respectfully traversed.

The alleged combination of Martin et al. '461 with Aquilino '993 and Applicant's claim 21 preamble is traversed. There is no basis for making the alleged combination and the Examiner has given no factual basis for the alleged combination. The uncombinability of Applicant's claim 21 preamble in view of Aquilino '993 has been discussed above and is believed equally applicable here. Martin et al. '461 is likewise uncombinable with Applicant's claim 21 preamble in view of Aquilino '993 because of a total lack of any factual foundation to make the combination.

However, even if the alleged combination of Martin et al. '461, Aquilino '993 and Applicant's claim 21 preamble were combined, however untenably, it still would not reach Applicants claimed invention. Claims 29 and 34 depend ultimately from claim 21 and define over the alleged combination of Martin et al. '461, Aquilino '993 and Applicant's preamble in the same fashion that claim 19 defines over Aquilino '993 and Applicant's claim 19 preamble. The Martin et al. '461 patent adds nothing to the alleged combination that would meet the limitations of claim 21.

The Examiner's allowability of claims 30, 35 and 36 is noted with thanks and appreciation. However, in view of Applicant's position of the allowability of the claims from which these claims depend, these claims have not been rewritten in independent form.

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Examiner: Blair M. Johnson
Group Art Unit: 3634

In view of the foregoing remarks and amendments, is it submitted that all of the claims in this application are in condition for allowance. Early notification of allowability is respectfully requested.

Respectfully submitted,

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